Weyerhaeuser

Environment Health & Safety, WTC 2G2
PO Box 9777
Federal Way, WA 98063-9777
Telephone: (253) 924-3746
Fax: (253) 924-6182
E-Mail: Jennifer.hale@weyerhaeuser.com

April 16, 2008

Mr. Sam Chummar, Remedial Project Manager
U.S. Environmental Protection Agency - Region 5
Superfund Division - Remedial Response Branch #1
77 W. Jackson Blvd. (SR-6J)
Chicago, IL 60604

Subject: Disposal Information
Plainwell Mill Emergency Action
Allied Paper, Inc./Portage Creek/Kalamazoo River Site

Dear Mr. Chummar:

The approved Plainwell Mill Banks Emergency Action Design Report identified material handling, general transportation, and overall disposal plans for the removed residual material. Some of the details regarding sampling protocols, disposal facilities, and scheduling was not available at the time of the final report. This letter provides additional information regarding a number of those issues.

A total of approximately 3,000 to 4,000 cubic yards of paper residuals were removed from the Plainwell Mill banks from November 2007 through March 2008 as part of the Emergency Action. These materials are currently stored on site within the LLDPE-lined containment pad and two HDPE-lined roll off boxes (approximately 50 cubic yards) located at the center of the Plainwell Mill property. As is, the material has a moisture content of 25 to 35 percent which limits transport and landfill disposal acceptance and will require solidification prior to transport.

Material Characterization and Solidification

The material has been sampled, as described below, to ensure proper disposal.

1. The containment pad is separated into four quadrants. Each of the quadrants was sampled for total PCBs prior to the addition of the stabilizing agent (PAD 1A, 1B, 2A, 2B). The results indicated total PCB concentrations of 3.24 mg/kg, 3.2 mg/kg, 3.38 mg/kg, and 2.56 mg/kg.
2. Mintek Calciment bottom ash was used as the solidifying agent. A Material Safety Data Sheet is attached. The Calciment material was brought on site in small quantities (one to two trucks daily) and placed within the containment pad immediately adjacent to the waste material. The Calciment was then mixed into the residual material using a backhoe.
3. Air monitoring was conducted during offloading and mixing of the Calciment material according to the Site Health and Safety Plan. Preliminary air monitoring results from the personal data RAM indicate that the maximum short term exposure limit (15 minute average) observed was ~1 mg/m^3. This value is significantly lower than the OSHA 8-Hour Time Weighted Average threshold value of 15 mg/m^3.

4. After addition of solidifying agent, two samples were collected for waste characterization[1] (PAD-1 and PAD-2). Waste Management Westside RDF requires analysis of the following prior to accepting the material: paint filter, SVOCs, VOCs, RCRA Metals, pesticides and herbicides, and PCBs. Results will be submitted to the USEPA upon receipt.
5. Both segregated dumpsters have been analyzed for PCBs. RB-East (3.21 mg/kg) is the material segregated from the central portion of Zone C. RB-West (0.62 mg/kg) is the material segregated from the east end of Zone D. Results of the samples are attached. Based on the results, disposal options for this material will be reviewed and approved by the USEPA RPM.

Loading and Transportation

To minimize dust generation, a temporary gravel haul road has been constructed adjacent to the south side of the containment pad (see Figure 1). The temporary road will provide improved access for loading the trucks adjacent to the containment pad. Once trucks are loaded, they will proceed to a spray wash area prior to exiting the site. The spray wash area will be lined with HDPE and sloped to collect the spray wash water into a sump. Trucks will be sprayed with a pressure washer to remove any materials that may have collected on the outside during loading operations. The water in the sump will then be pumped to a temporary holding tank. Once the temporary holding tank has been filled, the sump water will be treated in combination with the dewatering liquids and rain water through the on-site water treatment system, volumes will be well within design capacity of the system.

A properly licensed hauler will be utilized for transport of materials using HDPE-lined trucks with bed covers. It is anticipated that 15 to 20 trucks per day will be loaded and sent to the disposal facility. The trucks will enter the property off of the newly constructed haul road across from Prince Street and exit the site on Cedar Street. The City of Plainwell has been contacted regarding the truck traffic. Based on the estimated amount of material in the pad, 6 to 8 working days of truck disposal is expected at this time. Transportation of the segregated material may require additional licensing requirements for the transporter which will be addressed once the disposal option is chosen for that material.

Disposal

Two facilities have been designated to accept the waste material from the site. Materials located within the containment pad (Approximately 3,000 – 4,000 cubic yards) will be transported to:

Waste Management Westside RDF
14094 M-60 West
Three Rivers, MI 49093

[1] A separate waste characterization sample was collected on January 3, 2008, and analyzed. The results for that characterization sample have been provided to the USEPA and are included as Attachment 3.

Solid waste disposal area operating license: 9026

For material presently within the dumpsters, if necessay, will be transported to:

The Environmental Quality Company - Wayne Disposal, Inc. Site #2 Landfill
49350 N I-94 Service Drive
Belleville, MI 4811
USEPA ID #MID048 090 633

Proposed driving routes which have been reviewed with the trucking firms to each site are included as Attacment 2. The proposed route will be review with the City of Plainwell and any adjustments made upon their request.

Site Cleanup

Overall site cleanup includes removal of access roads (if necessary), disposal of the containment pad liner, and demobilizing equipment and materials. The surface of the temporary access roads used to access the banks during the removal efforts of bank residuals was scraped to a depth of 6 to 12 inches to remove any potential material that may have dropped from the equipment or trucks during transport of the waste material to the containment pad and will be disposed off site with the residual material.. The temporary roads used for trucking the material off site will be inspected and a decision made with input from the USEPA, MDEQ, and City of Plainwell regarding whether the roads need to be removed and roadbed material transported off site.

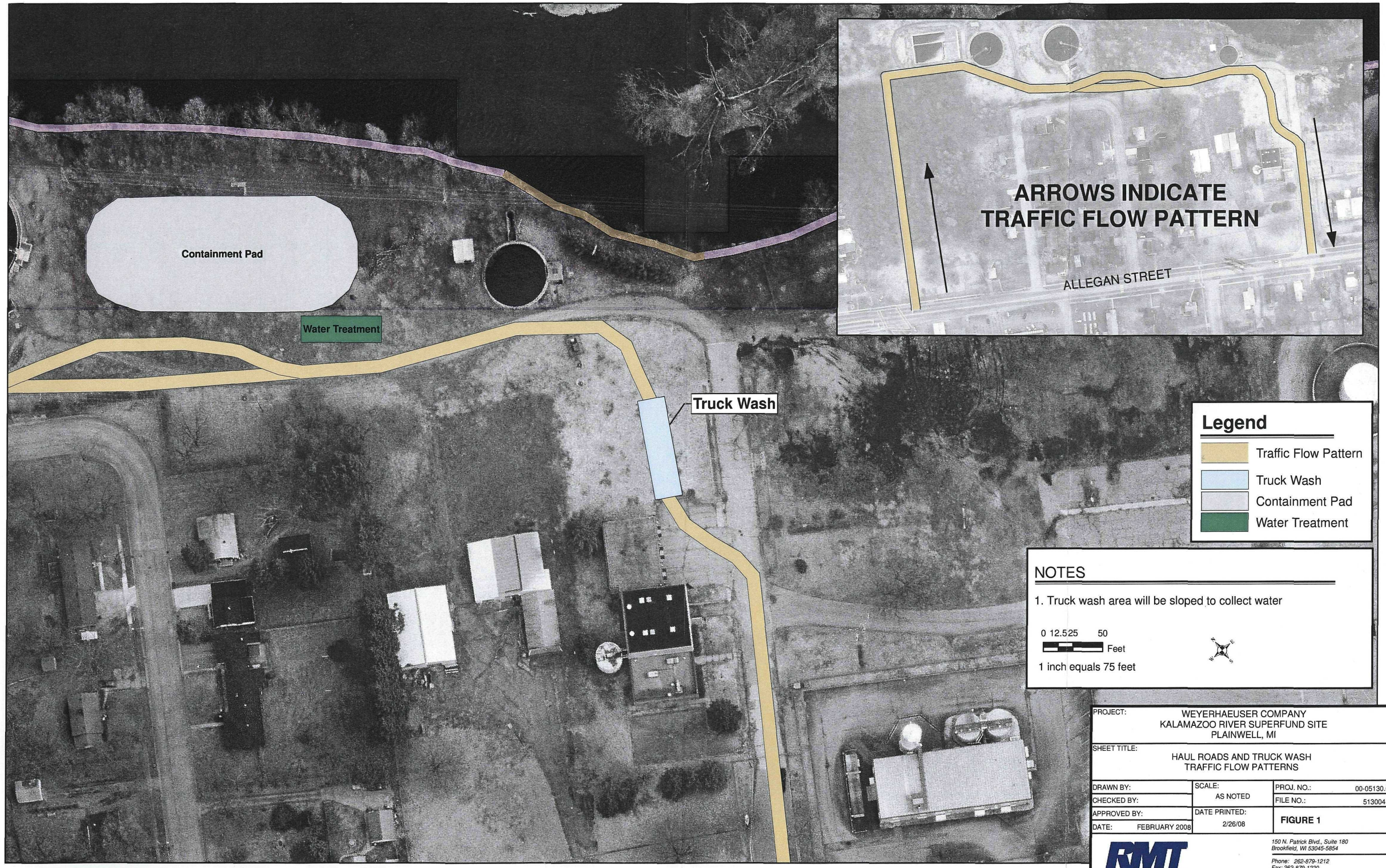
Please contact Jim Hutchens with RMT or myself if you have any questions on this letter. Thank you for your past feedback and we look forward to moving forward on proceeding with off -site disposal of the residual material. Upon your approval, we will provide you a confirmed schedule for this work.

Sincerely,
Weyerhaeuser Company

Jennifer Hale
Environmental Manager

cmk/attachments

cc: Paul Bucholtz, MDEQ
Erik Wilson, City of Plainwell
Kathy Huibregtse, RMT, Inc.
Jim Hutchens, RMT, Inc.



Legend

- Traffic Flow Pattern
- Truck Wash
- Containment Pad
- Water Treatment

NOTES

1. Truck wash area will be sloped to collect water

0 12.525 50
Feet

1 inch equals 75 feet

PROJECT:	WEYERHAEUSER COMPANY KALAMAZOO RIVER SUPERFUND SITE PLAINWELL, MI
SHEET TITLE:	HAUL ROADS AND TRUCK WASH TRAFFIC FLOW PATTERNS

DRAWN BY:	SCALE: AS NOTED	PROJ. NO.:	00-05130.04
CHECKED BY:		FILE NO.:	51300404
APPROVED BY:	DATE PRINTED: 2/26/08	**FIGURE 1**	
DATE: FEBRUARY 2008			

RMT
150 N. Patrick Blvd., Suite 180
Brookfield, WI 53045-5854
Phone: 262-879-1212
Fax: 262-879-1220

D:\05130\04\51300404.mxd 1/4/2008 13:20:29

MATERIAL SAFETY DATA SHEET

SECTION 1. PRODUCT IDENTIFICATION

Date: 01/01/08
Code: Oregon, OH

Product Name	Distributor	Telephone
Calciment® -	Mintek Resources, Inc.	937-431-0218 Office
Bed Ash	PO Box 340187	937-431-1305 Fax
	Beavercreek, OH 45434	800-424-9300 CHEMTREC

SECTION 2. TYPICAL COMPOSITION

Component	Formula	% Wt.	CAS No.	PEL
Calcium Oxide	CaO	50 - 55	1305-78-8	5mg/m^3
Amorphous Silica	SiO	2 - 3	7631-86-9	80mg/m^3
Aluminum Oxide	Al_2O_3	0.1 - 0.2	1344-28-1	15mg/m^3
Ferric Oxide	Fe_2O_3	0.5 -1	1309-37-1	10mg/m^3
Magnesium Oxide	MgO	2 - 4	1309-48-4	15mg/m^3
Calcium Sulfate	SO_3	35 - 38	7778-18-9	15mg/m^3

SECTION 3. HAZARD IDENTIFICATION

Potential Health Effects:

Inhalation (acute): Breathing dust may cause nose, throat or lung irritation and choking. The described effect depends on the degree of exposure and preexisting respiratory conditions.

Inhalation (chronic): Prolonged or repeated exposure may cause inflammation of the respiratory passages. May cause chemical bronchitis with coughing and difficulty breathing. Risk of injury depends on duration and level of exposure. Long term exposures which result in bronchitis may result in additional heath effects.

Eye Contact (acute/chronic): Initially may cause eye irritation with discomfort, tearing or blurring of vision. Continued overexposure could potentially cause burns and damage to cornea.

Skin Contact (acute/chronic): Initially may cause dry skin, redness, discomfort or irritation. Containued overexposure could potentially cause burns.

Ingestion (acute/chronic): Causes gastrointestinal tract irritation. May cause nausea vomiting and diarrhea. May cause central nervous system depression.

SECTION 4. FIRST AID MEASURES

Skin: Wash with soap and water. Seek medical attention if irritation develops or persists.
Eyes: Flush eyes with clean, low-pressure water for at least 15 minutes, occasionally lifting eyelids. Seek medical attention for abrasions.
Inhalation: Remove personnel from contaminated area to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Obtain medical attention for discomfort.
Ingestion: If ingested, do not induce vomiting, but drink plenty of water. Seek medical attention for discomfort.

SECTION 5. FIRE FIGHTING MEASURES

Flashpoint and Method: None.
Flammable Limits: Not combustible.
Autoignition Temperature: None.
General Hazard: Avoid breathing dust. Although this produet is not considered flammable it has the potential to generate heat when exposed to water.
Firefighting Instructions: Treat adjacent material.
Firefighting Equipment: This product is not a fire hazard. Self contained breathing apparatus is recommended if this material is exposed to heat since there is a possibility that toxic fumes may evolve.
Hazardous Combnstion Products: None.

SECTION 6. ACCIDENT RELEASE MEASURES

General: Ventilate area of leak or spill. Keep unnecessary and unprotected people away from area of spill. Wear appropriate personal protective equipment as specified in section 8. Collect and place in a suitable container for reclamation or disposal, using a method that does not generate dust.

SECTION 7. HANDLING AND STORAGE

Handling: Wash thoroughly after handling. Remove contaminated clothing and wash before reuse. Avoid contact with eyes, skin and clothing. Do not ingest or inhale.
Storage: Store in a well-ventilated area away from incompatible substances.
Storage Temperature: Unlimited.
Storage Pressure: Unlimited.
Empty Containers: Dispose of containers in an approved landfill or incinerator.

SECTION 8. PHYSICAL AND CHEMICAL PROPERTIES

Color:	Varying from light to dark gray/white mix of fine granules and powder
Boiling Point:	Not determined
Freezing Point:	None, solid
Viscosity:	None, solid
Vapor Pressure:	Not applicable
Vapor Density:	Not applicable
Specific Gravity:	Not determined
Solubility in Water:	Not determined
Evaporation Rate:	Not measurable
pH (in water):	Not determined

SECTION 9. STABILITY AND REACTIVITY

General: Product is stable but should be kept dry. It may react exothermically to produce heat when in contact with water.
Incompatible Materials and Conditions to Avoid: May generate hear when exposed to water. Will neutralize mineral acids producing calcium and magnesium based salts. Will absorb carbon dioxide in air. Avoid conditions that generate dusts.
Hazardous Polymerization: Will not occur.

SECTION 10. TOXILOGICAL INFORMATION

LD50/LC50: No information available.
Carcinogenicity: Not listed by ACGIH, IARC, NOISH, NTP or OSHA
Epidemiology: No information available.
Teratogenicity: No information available

SECTION 11. ECOLOGICAL INFORMATION

Not available.

SECTION 12. DISPOSAL CONSIDERATIONS

Dispose in landfill in accordance with all applicable regulations. Any disposal practice must be in compliance with local, provincial, state and federal laws and regulations. Contact local environmental agency for specific rules.

SECTION 13. TRANSPORTATION INFORMATION

Since the mixture varies by percentages of the different components to the point of being present or absent, it is difficult to evaluate bed ash based on DOT classifications.

SECTION 14. REGULATORY INFORMATION

Toxic Substance Control Act (TSCA)
Calcium Oxide (CAS# 1305-78-8) is listed on the TSCA inventory
None of the chemicals in this material are listed under TSCA Section 12b
None of the chemicals in this product have a SNUR under TSCA
None of the chemicals are on the Health and Safety reporting list
None of the chemicals in this product are under a Chemical Test Rule

SARA
Section 302: None of the chemicals in this material have a RQ (reportable quantity)
Section 302: None of the chemicals in this material have a TPQ (threshold planning quantity)
SARA Codes: Acute, Reactive
Section 313: No chemicals are reportable under Section 313

Clean Air Act
This material does not contain any hazardous air pollutants. No Class 1 or Class 2 Ozone depletors present.

Clean Water Act
CWA Hazardous Substances; none
CWA Priority Pollutants: None
CWA Toxic Pollutants: None

OSHA Hazard Communication Rule, 29 CFR 1910.1200:
One or more of the constituents identified are considered by OSHA to be hazardous.

STATE Right-to-Know
Calcium Oxide (CAS# 1305-78-8 is listed on the following state Right-to-Know lists: California, New Jersey, Florida, Pennsylvania, Minnesota, Massachusetts
Calcium Sulfate (CAS #7778-18-9) is listed on the following state Right-to-Know lists: Pennsylvania

CERCLA/SUPERFUND, 40 CFR 117,302:
Not listed.

WHMIS Information:
This product has a WHMIS classification of E, C

SECTION 15. MISCELLANEOUS OTHER INFORMATION

Abbrevations:

CAS No.	Chemical Abstract Service number
OSHA	Occupational Safety and Health Administration
PEL	Permissible Exposure Limit
ACGIH	American Conference of Governmental Industrial Hygienists
TLV	Threshold Limit Value
TWA	Time Weighted Average (8 hour)
CL	Ceiling Limit
Mg/m^3	milligrams per cubic meter
IARC	International Agency for Research on Caneer
NIOSH	National Institute for Occupational Safety and Health
pH	negative log of hydrogen ion greater than
DOT	U.S. Department of Transportation
TDG	Transportation of Dangerous Goods
CFR	Code of Federal Regulations
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
SARA	Superfund Amendments and Reauthorization Act

Pace Analytical
www.pacelabs.com

Pace Analytical Services, Inc.
1241 Bellevue Street
Green Bay, WI 54302
(920)469-2436

April 11, 2008

NATHAN WEBER
RMT MILWAUKEE
150 NORTH PATRICK BLVD.
SUITE 180
Brookfield, WI 53045

RE: Project: 5130.04 PLAINWELL MILL BANKS
Pace Project No.: 402162

Dear NATHAN WEBER:
Enclosed are the analytical results for sample(s) received by the laboratory on April 02, 2008. The results relate only to the samples included in this report. Results reported herein conform to the most current NELAC standards, where applicable, unless otherwise narrated in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Tod Noltemeyer

Tod Noltemeyer

tod.noltemeyer@pacelabs.com
Project Manager

Enclosures

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, Inc.
1241 Bellevue Street
Green Bay, WI 54302
(920)469-2436

CERTIFICATIONS

Project: 5130.04 PLAINWELL MILL BANKS
Pace Project No.: 402162

Green Bay Certification IDs
Florida (NELAP) Certification #: E87948
Illinois Certification #: 200050
California Certification #: 06246CA
New York Certification #: 11888
North Dakota Certification #: R-150
North Carolina Certification #: 503
Minnesota Certification #: 055-999-334
South Carolina Certification #: 83006001
Wisconsin Certification #: 405132750
Wisconsin DATCP Certification #: 105-444
Kentucky Certification #: 82
Louisiana Certification #: 04168

Green Bay Volatiles Certification IDs
Florida (NELAP) Certification #: E87951
California Certification #: 06247CA
Illinois Certification #: 200051
New York Certification #: 11887
North Dakota Certification #: R-200
North Carolina Certification #: 503
Minnesota Certification #: 055-999-334
South Carolina Certification #: 83006001
Wisconsin Certification #: 405132750
Wisconsin DATCP Certification #: 105-444
Kentucky Certification #: 83
Louisiana Certification #: 04169

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1241 Bellevue Street
Green Bay, WI 54302
(920)469-2436

SAMPLE SUMMARY

Project: 5130.04 PLAINWELL MILL BANKS
Pace Project No.: 402162

Lab ID	Sample ID	Matrix	Date Collected	Date Received
402162001	**RB-EAST**	Solid	04/01/08 10:24	04/02/08 10:25
402162002	**RB-WEST**	Solid	04/01/08 10:13	04/02/08 10:25

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Green Bay, WI 54302
(920)469-2436

SAMPLE ANALYTE COUNT

Project: 5130.04 PLAINWELL MILL BANKS
Pace Project No.: 402162

Lab ID	Sample ID	Method	Analysts	Analytes Reported
402162001	**RB-EAST**	ASTM D2974-87	GWS	1
		EPA 8082	BDS	10
402162002	**RB-WEST**	ASTM D2974-87	GWS	1
		EPA 8082	BDS	10

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1241 Bellevue Street
Green Bay, WI 54302
(920)469-2436

PROJECT NARRATIVE

Project: 5130.04 PLAINWELL MILL BANKS
Pace Project No.: 402162

Method: **EPA 8082**
Description: 8082 GCS PCB
Client: RMT MADISON
Date: April 11, 2008

General Information:
2 samples were analyzed for EPA 8082. All samples were received in acceptable condition with any exceptions noted below.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Sample Preparation:
The samples were prepared in accordance with EPA 3541 with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

Surrogates:
All surrogates were within QC limits with any exceptions noted below.

QC Batch: OEXT/1234

S0: Surrogate recovery outside laboratory control limits.
- RB-EAST (Lab ID: 402162001)
  - Decachlorobiphenyl (S)

Method Blank:
All analytes were below the report limit in the method blank with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Duplicate Sample:
All duplicate sample results were within method acceptance criteria with any exceptions noted below.

Additional Comments:

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1241 Bellevue Street
Green Bay, WI 54302
(920)469-2436

PROJECT NARRATIVE

Project: 5130.04 PLAINWELL MILL BANKS
Pace Project No.: 402162

Method: **ASTM D2974-87**
Description: Percent Moisture
Client: RMT MADISON
Date: April 11, 2008

General Information:
2 samples were analyzed for ASTM D2974-87. All samples were received in acceptable condition with any exceptions noted below.

Hold Time:
The samples were analyzed within the method required hold times with any exceptions noted below.

Initial Calibrations (including MS Tune as applicable):
All criteria were within method requirements with any exceptions noted below.

Continuing Calibration:
All criteria were within method requirements with any exceptions noted below.

Internal Standards:
All internal standards were within QC limits with any exceptions noted below.

Surrogates:
All surrogates were within QC limits with any exceptions noted below.

Method Blank:
All analytes were below the report limit in the method blank with any exceptions noted below.

Laboratory Control Spike:
All laboratory control spike compounds were within QC limits with any exceptions noted below.

Matrix Spikes:
All percent recoveries and relative percent differences (RPDs) were within acceptance criteria with any exceptions noted below.

Duplicate Sample:
All duplicate sample results were within method acceptance criteria with any exceptions noted below.

Additional Comments:

This data package has been reviewed for quality and completeness and is approved for release.

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1241 Bellevue Street
Green Bay, WI 54302
(920)469-2436

ANALYTICAL RESULTS

Project: 5130.04 PLAINWELL MILL BANKS
Pace Project No.: 402162

Sample: RB-EAST **Lab ID: 402162001** Collected: 04/01/08 10:24 Received: 04/02/08 10:25 Matrix: Solid

Results reported on a "dry-weight" basis

Parameters	Results	Units	PQL	MDL	DF	Prepared	Analyzed	CAS No.	Qual
8082 GCS PCB	Analytical Method: EPA 8082 Preparation Method: EPA 3541								
PCB-1016 (Aroclor 1016)	ND	ug/kg	1100	139	10	04/03/08 11:17	04/03/08 23:15	12674-11-2	
PCB-1221 (Aroclor 1221)	ND	ug/kg	1100	139	10	04/03/08 11:17	04/03/08 23:15	11104-28-2	
PCB-1232 (Aroclor 1232)	ND	ug/kg	1100	139	10	04/03/08 11:17	04/03/08 23:15	11141-16-5	
PCB-1242 (Aroclor 1242)	**2910**	ug/kg	1100	139	10	04/03/08 11:17	04/03/08 23:15	53469-21-9	
PCB-1248 (Aroclor 1248)	ND	ug/kg	1100	139	10	04/03/08 11:17	04/03/08 23:15	12672-29-6	
PCB-1254 (Aroclor 1254)	**294J**	ug/kg	1100	139	10	04/03/08 11:17	04/03/08 23:15	11097-69-1	
PCB-1260 (Aroclor 1260)	ND	ug/kg	1100	139	10	04/03/08 11:17	04/03/08 23:15	11096-82-5	
PCB, Total	**3210**	ug/kg	1100	139	10	04/03/08 11:17	04/03/08 23:15	1336-36-3	
Tetrachloro-m-xylene (S)	71	%	50-137		10	04/03/08 11:17	04/03/08 23:15	877-09-8	
Decachlorobiphenyl (S)	55	%	56-130		10	04/03/08 11:17	04/03/08 23:15	2051-24-3	S0
Percent Moisture	Analytical Method: ASTM D2974-87								
Percent Moisture	**8.8**	%	0.10	0.10	1		04/03/08 09:26		

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1241 Bellevue Street
Green Bay, WI 54302
(920)469-2436

ANALYTICAL RESULTS

Project: 5130.04 PLAINWELL MILL BANKS
Pace Project No.: 402162

Sample: RB-WEST **Lab ID: 402162002** Collected: 04/01/08 10:13 Received: 04/02/08 10:25 Matrix: Solid

Results reported on a "dry-weight" basis

Parameters	Results	Units	PQL	MDL	DF	Prepared	Analyzed	CAS No.	Qual
8082 GCS PCB	Analytical Method: EPA 8082 Preparation Method: EPA 3541								
PCB-1016 (Aroclor 1016)	ND	ug/kg	116	14.7	1	04/03/08 11:17	04/03/08 23:43	12674-11-2	
PCB-1221 (Aroclor 1221)	ND	ug/kg	116	14.7	1	04/03/08 11:17	04/03/08 23:43	11104-28-2	
PCB-1232 (Aroclor 1232)	ND	ug/kg	116	14.7	1	04/03/08 11:17	04/03/08 23:43	11141-16-5	
PCB-1242 (Aroclor 1242)	**244**	ug/kg	116	14.7	1	04/03/08 11:17	04/03/08 23:43	53469-21-9	
PCB-1248 (Aroclor 1248)	ND	ug/kg	116	14.7	1	04/03/08 11:17	04/03/08 23:43	12672-29-6	
PCB-1254 (Aroclor 1254)	**325**	ug/kg	116	14.7	1	04/03/08 11:17	04/03/08 23:43	11097-69-1	
PCB-1260 (Aroclor 1260)	**49.8J**	ug/kg	116	14.7	1	04/03/08 11:17	04/03/08 23:43	11096-82-5	
PCB, Total	**619**	ug/kg	116	14.7	1	04/03/08 11:17	04/03/08 23:43	1336-36-3	
Tetrachloro-m-xylene (S)	84	%	50-137		1	04/03/08 11:17	04/03/08 23:43	877-09-8	
Decachlorobiphenyl (S)	64	%	56-130		1	04/03/08 11:17	04/03/08 23:43	2051-24-3	
Percent Moisture	Analytical Method: ASTM D2974-87								
Percent Moisture	**13.7**	%	0.10	0.10	1		04/03/08 09:26		

Pace Analytical Services, Inc.
1241 Bellevue Street
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QUALITY CONTROL DATA

Project: 5130.04 PLAINWELL MILL BANKS
Pace Project No.: 402162

QC Batch: PMST/1129
QC Batch Method: ASTM D2974-87
Analysis Method: ASTM D2974-87
Analysis Description: Dry Weight/Percent Moisture
Associated Lab Samples: 402162001, 402162002

SAMPLE DUPLICATE: 12190

Parameter	Units	402154001 Result	Dup Result	RPD	Max RPD	Qualifiers
Percent Moisture	%	5.8	6.1	4	10	

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QUALITY CONTROL DATA

Project: 5130.04 PLAINWELL MILL BANKS
Pace Project No.: 402162

QC Batch: OEXT/1234 Analysis Method: EPA 8082
QC Batch Method: EPA 3541 Analysis Description: 8082 GCS PCB
Associated Lab Samples: 402162001, 402162002

METHOD BLANK: 12340
Associated Lab Samples: 402162001, 402162002

Parameter	Units	Blank Result	Reporting Limit	Qualifiers
PCB-1016 (Aroclor 1016)	ug/kg	ND	100	
PCB-1221 (Aroclor 1221)	ug/kg	ND	100	
PCB-1232 (Aroclor 1232)	ug/kg	ND	100	
PCB-1242 (Aroclor 1242)	ug/kg	ND	100	
PCB-1248 (Aroclor 1248)	ug/kg	ND	100	
PCB-1254 (Aroclor 1254)	ug/kg	ND	100	
PCB-1260 (Aroclor 1260)	ug/kg	ND	100	
Decachlorobiphenyl (S)	%	71	56-130	
Tetrachloro-m-xylene (S)	%	78	50-137	

LABORATORY CONTROL SAMPLE: 12341

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
PCB-1016 (Aroclor 1016)	ug/kg		ND			
PCB-1221 (Aroclor 1221)	ug/kg		ND			
PCB-1232 (Aroclor 1232)	ug/kg		ND			
PCB-1242 (Aroclor 1242)	ug/kg		ND			
PCB-1248 (Aroclor 1248)	ug/kg		ND			
PCB-1254 (Aroclor 1254)	ug/kg		ND			
PCB-1260 (Aroclor 1260)	ug/kg	500	359	72	61-115	
Decachlorobiphenyl (S)	%			73	56-130	
Tetrachloro-m-xylene (S)	%			80	50-137	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 12342 12343

Parameter	Units	402187006 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
PCB-1016 (Aroclor 1016)	ug/kg	<66.8			ND	ND					30	
PCB-1221 (Aroclor 1221)	ug/kg	<66.8			ND	ND					30	
PCB-1232 (Aroclor 1232)	ug/kg	<66.8			ND	ND					30	
PCB-1242 (Aroclor 1242)	ug/kg	<66.8			ND	ND					30	
PCB-1248 (Aroclor 1248)	ug/kg	1740			2370	2330				2	30	
PCB-1254 (Aroclor 1254)	ug/kg	<66.8			ND	ND					30	
PCB-1260 (Aroclor 1260)	ug/kg	751	1320	1320	1890	1930	87	90	65-135	2	30	
Decachlorobiphenyl (S)	%						57	58	56-130			
Tetrachloro-m-xylene (S)	%						71	71	50-137			

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, Inc.
1241 Bellevue Street
Green Bay, WI 54302
(920)469-2436

QUALIFIERS

Project: 5130.04 PLAINWELL MILL BANKS
Pace Project No.: 402162

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to changes in sample preparation, dilution of the sample aliquot, or moisture content.

ND - Not Detected at or above adjusted reporting limit.

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

S - Surrogate

1,2-Diphenylhydrazine (8270 listed analyte) decomposes to Azobenzene.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

Pace Analytical is NELAP accredited. Contact your Pace PM for the current list of accredited analytes.

ANALYTE QUALIFIERS

S0	Surrogate recovery outside laboratory control limits.

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: 5130.04 PLAINWELL MILL BANKS
Pace Project No.: 402162

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
402162001	**RB-EAST**	ASTM D2974-87	PMST/1129		
402162002	**RB-WEST**	ASTM D2974-87	PMST/1129		
402162001	**RB-EAST**	EPA 3541	OEXT/1234	EPA 8082	GCSV/1131
402162002	**RB-WEST**	EPA 3541	OEXT/1234	EPA 8082	GCSV/1131

Directions to Three Rivers, MI 49093-9268

YAHOO! LOCAL Maps

Summary and Notes

START (A) **220 Allegan St, Plainwell, MI 49080-1244**

FINISH (B) **Waste Management Incorporated**
(269) 279-5444
14094 M 60, Three Rivers, MI 49093-9268

Total Distance: 39.2 miles, Total Time: 45 mins (approx.)

Add your notes here...

	Distance
(A) 220 ALLEGAN ST, PLAINWELL, MI 49080-1244	
1. Start at **220 ALLEGAN ST, PLAINWELL** going toward **CEDAR ST**	go **0.8** mi
2. Take ramp onto **US-131 S**	go **36.7** mi
3. Bear (R) on **M 60(M-60 W)** toward **NILES**	go **1.7** mi
4. Arrive at **14094 M 60, THREE RIVERS**, on the (R)	go **< 0.1** mi
(B) 14094 M 60, THREE RIVERS, MI 49093-9268	

Distance: 39.2 miles, Time: 45 mins

When using any driving directions or map, it's a good idea to do a reality check and make sure the road still exists, watch out for construction, and follow all traffic safety precautions. This is only to be used as an aid in planning.

Directions to Van Buren Twp, MI 48111-1854

YAHOO! LOCAL Maps

Summary and Notes

START (A) **220 Allegan St, Plainwell, MI 49080-1244**

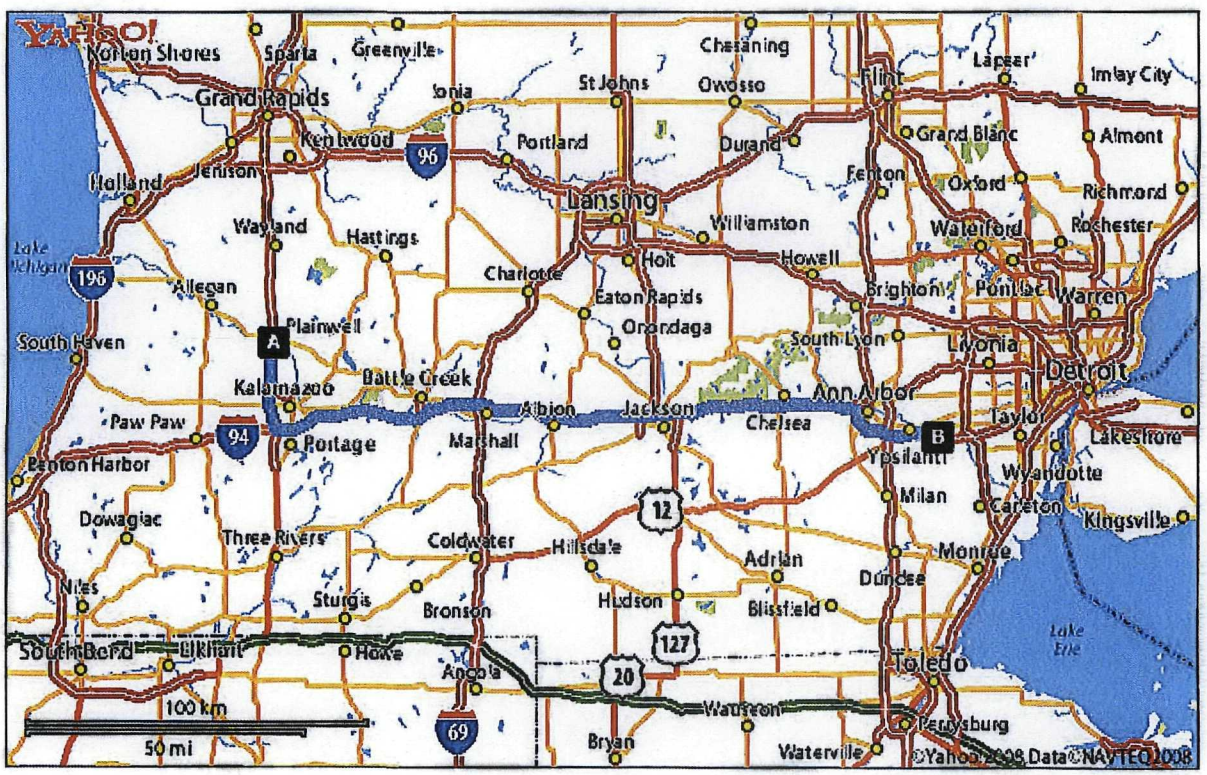
FINISH (B) **49350 N Interstate 94 Service Dr, Van Buren Twp, MI 48111-1854**

Total Distance: 131.4 miles, Total Time: 2 hours 1 mins (approx.)

Add your notes here...

	Distance
(A) 220 ALLEGAN ST, PLAINWELL, MI 49080-1244	
1. Start at **220 ALLEGAN ST, PLAINWELL** going toward **CEDAR ST**	go **0.8** mi
2. Take ramp onto **US-131 S**	go **15.1** mi
3. Take exit **#34A/DETROIT** onto **I-94 E**	go **113.7** mi
4. Take exit **#187/RAWSONVILLE RD**	go **0.3** mi
5. Turn **L** on **RAWSONVILLE RD**	go **0.3** mi
6. Turn **R** on **I-94 NORTH SERVICE DR**	go **1.3** mi
7. Arrive at **49350 N INTERSTATE 94 SERVICE DR, VAN BUREN TWP**, on the **L**	go **< 0.1** mi
(B) 49350 N INTERSTATE 94 SERVICE DR, VAN BUREN TWP, MI 48111-1854	

Distance: 131.4 miles, Time: 2 hours 1 mins



When using any driving directions or map, it's a good idea to do a reality check and make sure the road still exists,